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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 NECHE, LLC, a Nevada Limited
9 Liability Corporation,

10 Plaintiff,

11 vs.

12 ALLIED INSURANCE COMPANY
13 OF AMERICA, an Ohio Corporation;
NATIONWIDE MUTUAL
INSURANCE COMPANY, an Illinois
Corporation,

14 Defendants.

15 Case No. 2:19-cv-01016-APG-VCF

16 **STIPULATION AND ORDER
EXTENDING DEADLINE FOR
PLAINTIFF TO FILE FIRST
AMENDED COMPLAINT**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff
18 NECHE, LLC (“Neche” or “Plaintiff”) and Defendant ALLIED INSURANCE
COMPANY OF AMERICA (“Allied” or “Defendant”), by and through their
respective attorneys of record, that:

- 19
- 20 1. The deadline for Plaintiff to file its First Amended Complaint shall be
extended through and including March 20, 2020.
 - 21 2. The deadline for Defendant to file a Response to Plaintiff’s First Amended
Complaint shall be extended through and including April 3, 2020.

22 **Reason for the Extension:**

23 The Court previously granted Plaintiff an extension until February 28, 2020 to
file its First Amended Complaint and allowing Defendant until March 20, 2020 to
file its Response (Doc. 52). However, Plaintiff’s undersigned counsel, Michael N.
Poli (“Attorney Poli”) left his former firm (Merlin Law Group) on January 31, 2020,

1 and established a new firm, Poli, Moon & Zane. In doing so, it was uncertain
2 whether Attorney Poli would continue representing Plaintiff at his new firm.
3 Attorneys Michael Ponzo (“Attorney Ponzo”) and Courtney Abrams (“Attorney
4 Abrams”), both admitted *pro hac vice* were primarily handling this matter, under
5 Attorney Poli’s supervision.

6 On March 12, 2020 Attorneys Ponzo and Abrams filed a Notice of their
7 withdrawal as *pro hac vice* counsel for Plaintiff (Doc. 56), and Attorney Poli was
8 able to obtain the complete file from Merlin Law Group. After carefully reviewing
9 the file, Attorney Poli became aware that the Amended Complaint was never filed on
10 February 28, 2020, as ordered by the Court (Doc. 52).

11 Therefore, Plaintiff and Defendant respectfully request this Court grant
12 Plaintiff an extension through and including March 20, 2020 in which to file its First
13 Amended Complaint, and Defendant an extension through April 3, 2020 in which to
14 file its Response.

15 DATED this 19th day of March, 2020. DATED this 19th day of March, 2020.
16

17 By: /s/ Michael N. Poli
18 MICHAEL N. POLI, ESQ.
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20 *Attorneys for Plaintiff Neche, LLC*

By: /s/ Mayra Salinas-Menjivar
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22 *Attorneys for Defendant Allied
Insurance Company of American*

23
24 **ORDER**

25 IT IS SO ORDERED:
3-19-2020
26 DATED: _____



27 UNITED STATES MAGISTRATE JUDGE
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